

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SAMANTHA STUCKEY)	
)	
Plaintiff,)	
)	
v.)	
)	
)	C.A. 1:17-cv-10682-IT
COMMONWEALTH OF)	
MASSACHUSETTS, DEPARTMENT)	
OF STATE POLICE)	
)	
Defendant.)	
)	

JOINT STATEMENT OF THE PARTIES PURSUANT TO LOCAL RULE 16.1

Plaintiff Samantha Stuckey and Defendant Commonwealth of Massachusetts, Department of State Police (together, the “Parties”) hereby submit the following Joint Statement in advance of the scheduling conference set for September 26, 2017, at 2:30 p.m.

I. TIMETABLE FOR DISCOVERY AND MOTION PRACTICE

The Parties submit the following proposed schedule for discovery and pre-trial motion practice:

Initial Disclosures: Initial disclosures required by Fed. R. Civ. P. 26(a)(1) and by this Court shall be completed by October 10, 2017.

Fact Discovery—Interim Deadlines:

- a.** All requests for production of documents, interrogatories and requests for admissions shall be served and responded to on or before May 28, 2018.
- b.** All depositions, other than expert depositions, must be completed by May 28, 2018

Status Conference: The Parties propose a status conference near or immediately following the completion of fact discovery to discuss whether expert discovery will be necessary in this case, and if so, a reasonable time period for expert discovery.

Dispositive Motions: All dispositive motions shall be filed on or before June 27, 2018 with oppositions due on or before July 27, 2018. Any reply briefs shall be filed on or before August 17, 2018.

Dispositive Motion Hearing Date/Initial Pretrial Conference: The Parties shall appear on a date set by the Court sometime after August 17, 2018 for arguments on dispositive motions. Should no dispositive motions be filed, the Court shall schedule an initial pretrial conference at a time convenient for the Court. The parties shall prepare and submit a pretrial memorandum in accordance with Local Rule 16.5(d) five business days prior to the date of the pretrial conference.

II. OTHER MATTERS

Settlement: Plaintiff has presented a written settlement demand, which the Defendant will consider and be prepared to discuss at the Conference.

Motions: Currently no motions are pending before the court.

Magistrate Judge: The parties do not consent to trial by magistrate judge.

Local Rule 16.1(d)(3) certifications: The parties shall file their Local Rule 16.1(d)(3) certifications under separate cover and in advance of the Conference.

Respectfully submitted:

COMMONWEALTH OF MASSACHUSETTS,
DEPARTMENT OF STATE POLICE
By its Attorneys

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-and-

SAMANTHA STUCKEY
By her Attorney

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CERTIFICATE OF SERVICE

I, Abigail Fee, Assistant Attorney General, certify that this document filed through the ECF system on September 19, 2017 will be sent electronically to the registered participants as identified on the notice of electronic filing (NEF) and paper copies will be sent to those indicated as non-registered participants by first class mail, postage prepaid.

/s/ Abigail Fee
Abigail Fee
Assistant Attorney General